



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 02 2014

REPLY TO THE ATTENTION OF

Mr. Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft part 70 operating permit renewal, permit number 127-31788-00001, for ArcelorMittal Burns Harbor, LLC, located in Burns Harbor, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) Condition D.1.2(a) of the draft permit limits Nitrogen Oxide (NOx) emissions from Coke Battery #2. The permit does not specify the method to measure or otherwise determine NOx emissions from Coke Battery #2. Please clarify or specify in the permit the method to determine NOx emissions from Coke Battery #2.
- 2.) Condition D.1.2(d) limits underfiring Particulate Matter (PM) emissions. It's not clear from the permit how compliance with this emission limit is determined or otherwise ensured. Please clarify how the permit ensures compliance with the PM limit and identify the monitoring, recordkeeping, and reporting requirements sufficient to ensure compliance with this permit condition.
- 3.) Condition D.1.2(e) limits the Total Dissolved Solids (TDS). This limit is used to ensure Coke Battery #2 PM emissions do not exceed 0.31 pounds per ton of coal. It's not clear whether the permit contains monitoring, recordkeeping, or reporting to ensure compliance with the TDS limit. Please explain which permit conditions are intended to ensure compliance with the TDS limit and determine whether these conditions are sufficient to ensure compliance with the TDS and PM limits.

- 4.) Although the condition is identified as not federally enforceable, condition D.1.16(b) refers to permit condition C.13(c) for recordkeeping requirements. The current draft permit does not contain condition C.13(c). This permit condition should be updated to accurately reflect the appropriate recordkeeping requirements.
- 5.) Condition D.3.6(b) requires the Permittee to maintain a log of information necessary to document the compliance status with condition D.3.2. Condition D.3.2 requires the dryers to use only natural gas. Condition D.3.6(b) should identify the appropriate records that must be kept to ensure compliance with the fuel requirement in condition D.3.2.
- 6.) Condition D.6.7 lists PM compliance determination requirements. However, condition D.6.7 does not identify its origin of authority. Please identify and include within the permit the origin of authority for this permit condition.
- 7.) Condition D.6.15(a) requires the Permittee to maintain a log of information necessary to document compliance with condition D.6.1(a), but does not identify the information that the Permittee is required to keep, except hot iron throughput. Please explain how recording hot iron throughput is sufficient to document the compliance status with condition D.6.1(a). Condition D.6.15(a) should also identify any additional information required to document compliance with condition D.6.1(a).
- 8.) Condition D.6.15(f), as written, refers to "the control device", but does not identify the control device. Please update this condition to identify the control device this condition applies to.
- 9.) Condition D.9.9(b) requires the Permittee to maintain a log of information necessary to document compliance with condition D.9.6, where condition D.9.6 gives NOx limits. Condition D.9.9(b) should identify the information that the Permittee must keep to document compliance with condition D.9.6.
- 10.) In the permit, there are several permit conditions which cite 326 IAC 6-6 as their origin of authority. Some of these permit conditions are designated as "not federally enforceable" because 326 IAC 6-6 has not been approved into Indiana's state implementation plan. However, other permit conditions citing 326 IAC 6-6 as the origin of authority are not designated as being "not federally enforceable". Some of these permit conditions are conditions D.5.5, D.9.2, D.10.1, and D.10.4. Please clarify within the permit whether or not these conditions are federally enforceable. Please also verify that other conditions within the permit deriving authority from 326 IAC 6-6 are appropriately designated as not being federally enforceable.
- 11.) The requirements of 40 C.F.R. 63, Subpart CCC, are included as attachment D of the permit. Attachment D of the permit does not incorporate the most recent version of Subpart CCC. Please update attachment D to reflect the current version of 40 C.F.R. 63, Subpart CCC.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script, reading "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name and title.

Genevieve Damico

Chief

Air Permits Section